

October 15, 1992

Ms. Kathleen Katz
State of New Jersey
Department of Environmental Protection and Energy
Division of Responsible Party Site Remediation
Bureau of Environmental Evaluation, Cleanup
& Responsibility Assessment
401 East State Street
Trenton, New Jersey 08625

Re: Hexcel Corporation (Hexcel)
Lodi Borough, Bergen County
ECRA Case # 86009

Dear Ms. Katz:

This is in response to the Department's letter of September 10, 1992 to Edward A. Hogan, Esq. in which the Department establishes soil cleanup standards for the above referenced site. In this letter, it is stated that "The Borough of Lodi does not qualify for a non-potable ground water use area pursuant to the proposed Ground Water Standards N.J.A.C. 7:9-6.5(e)2 because the majority of the borough's population relies on ground water withdrawn from within the borough for potable supply". For this reason, the Department is requiring that Hexcel apply the subsurface soil standards which are protective of groundwater at this site. The purpose of this letter is to request that the Department reconsider this designation based on the following information.

Our review of USEPA document EPA/540/4-90/030, the Fall 1991 NJDEPE Site Status Report and local information indicates however, that Hexcel is not located in a potable use groundwater area (Class IIA). The Lodi Municipal Wells are presently listed on the National Priorities List (NJD980769301) due to unacceptable levels of volatile organic compounds (VOCs) as well as uranium and radium-226. This contamination resulted in the closure of the wellfield during the period of 1981 through 1987. The last well was closed in June 1987. The Hackensack Water Company and the Passaic Valley Water Commission are now supplying the Borough with potable water. In addition to Lodi Borough, municipal wells in neighboring Wallington and Garfield have been closed due to VOC contamination, indicating a regional groundwater quality problem.

In accordance with Item 14 of the Cleanup Plan approval letter, Hexcel conducted a well search within a half mile radius of the site. The results of this investigation were transmitted to the NJDEPE in a letter dated October 11, 1990 from A. William Nosil of Hexcel. The results of the well search indicated that there are no potable water supply wells within a half mile radius of the Hexcel site. This information was confirmed by the Borough of Lodi Health Department and the Bergen County Health Department.

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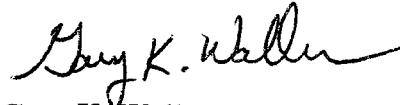
In addition to the well search information developed by Hexcel, Killam Associates has performed well searches for several other industrial sites located in the Borough of Lodi and the City of Garfield. A review of the data developed by Killam for another industrial site in Lodi (Mark-TeX Corporation, ECRA Case No. 87647) that is within 2000 feet of the Hexcel site confirms that the area is not a potable use groundwater area (Class IIA). This determination was made based upon a detailed well search supplemented by a water purveyor survey and canvassing residents within the Borough of Lodi. In a Department letter dated June 13, 1991, the Department concurred with this determination. Specifically, the Department states "the facility is not in a water use area".

Given the above information, Hexcel respectfully requests that the Department reconsider the classification of groundwater in the area of the Hexcel site. As detailed above, the borough's population does not rely on ground water withdrawn from within the borough for potable supply. In addition, the groundwater in the area is not suitable for potable purposes due to regional groundwater contamination. There is no indication that the Borough of Lodi plans to use groundwater for potable purposes in the future. Based upon the above, it is Hexcel's position that the non-potable ground water use area standards contained in the proposed Ground Water Standards, N.J.A.C. 7:9-6.5(e)2 should apply to the Hexcel site.

If the Department has any questions or comments on the information contained in this letter, please contact me at (201) 912-2489. We look forward to receiving a response to this letter shortly.

Very truly yours,

KILLAM ASSOCIATES



Gary K. Walker
Senior Project Scientist

cc: A. William Nosil, Hexcel
Lisa M. Bromberg, Porzio, Bromberg & Newman

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